

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

THE BOEING COMPANY,

Defendant.

THE BOEING COMPANY,

Counterclaimant,

v.

UNITED STATES OF AMERICA,

Counterclaim-Defendant.

CASE NO. C22-0485JLR

**JOINT STIPULATED MOTION AND  
[Proposed] ORDER TO EXTEND  
DEADLINE FOR RULE 30(b)(6)  
DEPOSITIONS AND EXPERT  
DISCOVERY AND MOTION  
DEADLINES**

**Noting Date: July 8, 2024**

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The United States and Boeing jointly move the Court for permission to take depositions under FRCP 30(b)(6) after the Court's July 19, 2024 deadline for completion of fact discovery in this matter and to briefly extend the deadlines set forth in the Court's Order at ECF No. 77 for expert discovery and motions practice. Granting the Parties' request will not alter the trial-ready date for this matter.

The Parties have diligently pursued fact discovery, deposing many witnesses, serving numerous requests for production, requests for admission, and interrogatories, and conferring as needed. Although the Parties expect to complete all responses to outstanding discovery requests before the Court's July 19, 2024 deadline, given the age, volume, means of storage, and location of many documents in this case, some documents may not be produced until the final week of fact discovery. To allow for productive 30(b)(6) depositions, the Parties request to take depositions under FRCP 30(b)(6) until **September 6, 2024**, and to briefly extend the expert discovery deadlines and the deadline for motions as follows:

EVENT	CURRENT DEADLINE UNDER ECF NO. 77	PROPOSED REVISED DEADLINE
Initial Phase I expert written reports completed in accordance with Fed. R. Civ. P. 26(a)(2)(B) must be served.	August 30, 2024	October 11, 2024
The identity of any experts who may testify in rebuttal to any initial Phase I expert must be disclosed.	October 4, 2024	November 8, 2024
Any rebuttal expert's written report completed in accordance with Fed. R. Civ. P. 26(a)(2)(B) must be served.	October 31, 2024	December 13, 2024
All Phase I expert discovery must be complete	January 31, 2025	February 28, 2025
All non-dispositive motions, other than motions in limine, are due	January 31, 2025	February 28, 2025

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All dispositive motions are due	February 28, 2025	March 31, 2025
Motions in limine are due	March 14, 2025	April 11, 2025

All other deadlines will remain as set forth in the Court's February 27, 2024 Order (ECF No. 77).

Respectfully submitted,

**For the United States of America:**

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Assistant Attorney General  
Environment and Natural Resources Division  
U.S. Department of Justice

/s/ Stefan J. Bachman

Dated: July 5, 2024

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/s/ P. Derek Petersen

Dated: July 5, 2024

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**ORDER**

10 Based on the foregoing, IT IS SO ORDERED.  
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12 Dated: \_\_\_\_\_

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13 The Honorable James L. Robart  
14 UNITED STATES DISTRICT JUDGE  
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27 JOINT STIPULATED  
28 MOT. TO EXTEND EXPERT  
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